

IN THE UNITED STATES  
DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO

**In re:**

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative  
of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 21738

(Jointly Administered)

URGENT CONSENSUAL MOTION FOR A FOURTH EXTENSION  
TO RESPOND TO OBJECTION TO CLAIM ECF No. 21738

TO THE HONORABLE UNITED STATES DISTRICT COURT  
JUDGE LAURA TAYLOR SWAIN:

COMES NOW, ROCKET LEARNING LLC, through the undersigned counsel to respectfully request a fourth extension to file its response to the FOUR HUNDRED EIGHTY-EIGHTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES' RETIREMENT SYSTEM OF

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO DEFICIENT CLAIMS, filed at ECF No. 21738.

The appearing creditor respectfully prays for an order granting the relief requested in this motion.

## **BACKGROUND**

1. The Debtor filed the *Four Hundred Eighty-Eighth Omnibus Objection (Non-Substantive) Of The Commonwealth Of Puerto Rico, The Employees' Retirement System Of The Government Of The Commonwealth Of Puerto Rico, And The Puerto Rico Public Buildings Authority To Deficient Claims* on August 5, 2022, at ECF No. 21738, ("the Objection").
2. Among the claims they objected to is number 115471, filed by creditor Rocket Learning LLC. The claim includes supporting documents that afford the claim a prima facie validity as to the existence of the debt, the amount of the debt, and the legal basis of the claim in compliance with statutory requirements. However, the Debtor is contesting the creditor's asserted liability and requesting additional supporting documents to validate the claim.
3. To continue promoting and pursuing a consensual resolution of the Objection to claim 115471, requested three consented extensions to respond to the Objection to its claim filed at ECF No. 21738. The Court granted the extensions at ECF Nos. 22072, 22414, and 22841.

4. Two more sources of supporting documents were sent to counsel for the FOMB and are currently under review. These sources were sent to DCG LLC in April 2020 during the document production processes.
5. Those two sources have documents that also evince the nature of the proof of claim and the amount. However, the sources are voluminous and extensive; as expected, the review is ongoing.

#### **REQUEST FOR RELIEF**

6. Therefore, this Urgent Motion requesting this fourth consensual extension is filed with the acquiescence of the Financial Oversight and Management Board for Puerto Rico (“the FOMB”). **Counsel Joshua A. Esses of Proskauer** has informed in writing the FOMB consents to the extension requested and the dates included herein.
7. Rocket Learning LLC respectfully **requests January 9, 2023**, as the deadline to respond to the Objection. The FOMB, through Mr. Esses, **agreed to January 23, 2023** as the deadline for the FOMB to reply.
8. Upon the representations made by Mr. Esses in writing and the good faith communication between counsel for FOMB and Rocket Learning LLC, no opposition to this Urgent Motion requesting an additional extension is anticipated.

Therefore, the FOMB and Rocket Learning LLC agree and propose these deadlines:

- a. The deadline for Rocket Learning LLC to respond to the Objection to claim shall be extended to **January 9, 2023**.
- b. The deadline for Movants to reply shall be extended to **January 23, 2023**.
- c. The Court will schedule a hearing on the Objection to claim.

**WHEREFORE**, Rocket Learning LLC respectfully prays for the Court to grant this Urgent Consensual Motion and enter the Proposed Order and such other relief as is just and proper.

**I HEREBY CERTIFY** a copy of this notice of appearance was filed with the Clerk of the Bankruptcy Court for the District of Puerto Rico using the CM/ECF system, which will serve notice and copy of this filing to all registered participants.

**Notice**

Notice of this Urgent Motion in compliance with the Case Management Procedures has been sent to all the standard parties as instructed.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on December 5, 2022.

**Counsel for Rocket Learning LLC**

/S/ **M<sup>a</sup> Mercedes Figueroa y Morgade**  
**M<sup>a</sup> MERCEDES FIGUEROA Y MORGADE**  
USDC-PR #207108  
3415 Alejandrino Ave.,  
Apt. 703,  
Guaynabo, PR 00969-4856  
Tel: 787-234-3981  
**figueroaymorgadelaw@yahoo.com**